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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ASTRAZENECA AB, AKTIEBOLAGET
HÄSSLE, ASTRAZENECA LP,
KBI INC., and KBI-E INC.

Plaintiffs and
Counterclaim Defendants,

v.

HANMI USA, INC., HANMI
PHARMACEUTICAL CO., LTD., HANMI
FINE CHEMICAL CO., LTD, and HANMI
HOLDINGS CO., LTD.,

Defendants and
Counterclaim Plaintiffs

Civil Action No. 3: 11-cv-00760-JAP-TJB

District Judge Joel A. Pisano
Magistrate Judge Tonianne J. Bongiovanni

**NOTICE OF PLAINTIFF'S MOTION
FOR INJUNCTION PENDING APPEAL**

Expedited Motion Day Requested

ORAL ARGUMENT REQUESTED

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that as soon as counsel may be heard, Plaintiffs-Counterclaim-Defendants AstraZeneca AB, Aktiebolaget Hässle, AstraZeneca LP, KBI Inc., and KBI-E Inc. (collectively, “AstraZeneca” or “Plaintiffs”) will move before this Court at the United States District Court for the District of New Jersey, 402 East State Street, Trenton, New Jersey, before the Honorable Joel A. Pisano, United States District Judge, for entry of a preliminary injunction against Defendants Hanmi, Inc., Hanmi Pharmaceutical Co., Ltd., Hanmi Fine Chemical Co., Ltd. and Hanmi Holdings Co., Ltd. (collectively, “Hanmi”), preliminarily enjoining Hanmi from the impending marketing and sale of its esomperazole strontium product, while an appeal in this case remains pending before the United States Court of Appeals for the Federal Circuit (Case No. 13-1490).

PLEASE TAKE FURTHER NOTICE that in conjunction with Plaintiffs’ Motion for an Injunction Pending Appeal, Plaintiffs will seek a temporary restraining order against Hanmi effective immediately, temporarily restraining Hanmi from marketing and sale of its esomperazole strontium product until the Court’s resolution of the preliminary injunction motion;

PLEASE TAKE FURTHER NOTICE that Plaintiffs will rely upon the Memorandum of Points and Authorities in Support of Plaintiffs’ Motion for Injunction Pending Appeal, the Declaration of Maureen M. Japha, the Declaration of Nimish Vakil, M.D., the Declaration of Porbert P. Navarro, Pharm. D., the Declaration of Robert Maresca, the supporting exhibits to these Declarations, and oral argument of counsel;

PLEASE TAKE FURTHER NOTICE that a Proposed Order granting Plaintiffs’ Motion for Injunction Pending Appeal is attached;

PLEASE TAKE FURTHER NOTICE that a Proposed Order granting Plaintiffs' Motion for a Temporary Restraining Order is attached.

Dated: August 20, 2013

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2013, I caused a copy of the foregoing NOTICE OF PLAINTIFFS' MOTION FOR INJUNCTION PENDING APPEAL and supporting documents to be served upon the following counsel by operation of the Court's electronic filing system and/or electronic mail:

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